

# **EXHIBIT F**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

LIFE FOR RELIEF & DEVELOPMENT,

Plaintiff,  
vs

Case No: 2:12-13550-CV  
Hon. Denise Page Hood

BANK OF AMERICA, N.A.

Defendant.

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**AMENDED JOINT FINAL PRETRIAL ORDER**

“include, but are not limited to” those listed herein.

Pursuant to Rule 26(a)(3)(B), Defendant reserves all objections under FRE 402 and 403.

- Mohammed Alomari (**Fact Witness**).

- ***Plaintiff May Call:***

- Deposition Witness (re: Excerpts of Christa K. Marshall Deposition, including but not limited to those designations identified above);
  - Defendant objects as set forth above.
- Deposition Witness (re: Excerpts of Loretta Griffin Deposition, including but not limited to those designations identified above);
  - Defendant objects as set forth above.
- Deposition Witness (re: Excerpts of Andrea Lowry Deposition, including but not limited to those designations identified above);
  - Defendant objects as set forth above.
- Deposition Witness (re: Excerpts of Dennis Lormel Deposition. Plaintiff's Deposition Designations for Mr. Lormel in the event

he does not testify live at trial include, but are not limited to:

pp. 112:9-10; 114:7-15; 130:23-25; 133:17-21).

- Defendant Objects: Defendant objects that, as discussed in more detail in Defendant's Motion in Limine, such deposition excerpts constitute hearsay, FRE 801-802. Defendant further objects that Plaintiff has not provided specific deposition designations in accordance with Fed. R. Civ. P. 26(a)(3)(A)(ii) as Plaintiff states that its designations "include, but are not limited to" those listed herein. Pursuant to Rule 26(a)(3)(B), Defendant reserves all objections under FRE 402 and 403.

| <b>Plaintiff's Designation</b> | <b>Defendant's Objection</b>  | <b>Defendant's Counter-Designation (if Plaintiff able to present Mr. Lormel's hearsay testimony)</b> |
|--------------------------------|---|--|
| 112:9-10                       | Hearsay; Incomplete   |  |
| 114:7-15                       | Hearsay; lack of foundation; calls for speculation; incomplete; assumes facts not in evidence | 114:7-23   |
| 130:23-25                      | Hearsay within hearsay; lack of foundation; calls for speculation; incomplete                 |  |
| 133:17-21                      | Hearsay; lack of foundation; calls for speculation; incomplete; improper hypothetical         | 133:14-21  |

Out of an abundance of caution if Plaintiff is able to present Mr. Lormel's deposition testimony, Defendant counter-designates the following portions of Mr. Lormel's deposition: 12:16-13:21; 15:16-16:15; 20:23-21:6; 22:11-24:5; 49:5-51:1; 71:25-72:12; 75:21-76:3; 77:12-18; 83:15-24; 85:18-86:11; 87:3-14; 110:8-111:10; 111:16-112:1; 116:8-11; 137:21-138:7; 138:17-139:9; 139:20-25; 144:19-145:2; 157:15-25; 158:1-16.

- o Imad Hamed (**Fact Witness**);
  - Defendant Objects: Lacks personal knowledge as to material issues, FRE 602; Testimony would be irrelevant, FRE 401-402; Probative value substantially outweighed by danger of confusing the issues, misleading the jury, unfair prejudice, wasting time, FRE 403; Testimony likely premised on hearsay, FRE 801-802.
- o Former Congressmen, Hon. Hansen Clark (**Fact Witness**);
  - Defendant Objects: Lacks personal knowledge as to material issues, FRE 602; Testimony would be irrelevant, FRE 401-402; Probative value substantially outweighed by danger of confusing the issues, misleading the jury,

Respectfully submitted,

AKEEL & VALENTINE, PLC

(without consent)

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Dated: July 22, 2016

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U.S. DISTRICT COURT JUDGE

Dated: